

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS;  
Case No. 1:23-cv-10211-SHS

**NOTICE OF ERRATA AND  
CORRECTION TO DKT. 81 IN THE  
AUTHOR ACTIONS**

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JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

Please take notice of the following errata and correction to the parties' joint Opposition to Motion to Intervene and Dismiss, Stay or Transfer filed in the consolidated Author Actions, Dkt. 81: on page 5, Plaintiffs inadvertently listed the filing date for the Consolidated Amended Complaint as February 2, 2024; it has been corrected to read "February 5, 2024." Minor typographical errors, listed below, have also been corrected.<sup>1</sup>

A corrected copy of Plaintiff' Opposition to Motion to Intervene or Dismiss, Stay or Transfer is attached to this filing.

Dated: February 28, 2024

Respectfully submitted,

/s/ Rachel Geman

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<sup>1</sup> For ease of reading, Plaintiffs also removed various extra spaces.

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*Attorneys for Plaintiffs and the Proposed Class*

**List of Typographical Error Corrections**

Page	As in Original	Correction
3	“The Authors Actions”	“The Author Actions” <sup>2</sup>
3	(LMMs),	(LMMs);
3	Proposed Intervenor’s	Proposed Intervenor
4	a the Authors Guild	the Authors Guild
5	Subsequently, Plaintiffs	Plaintiffs
6	issue for Plaintiffs the proposed Classes	issue for the proposed Classes
6	Class’	Classes’
11	intervention”	intervention.”
12	regime for artificial intelligence.”	regime for artificial intelligence.
15	(and Author Classes) give	(and Author Classes) to give
15	bogged down Rule 12 motions	bogged down by Rule 12 motions

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<sup>2</sup> Plaintiffs made similar corrections to “Author Actions” on pages 16, 17, 18, 19, 20, and 23.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

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Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

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Defendants.

Case No. 1:23-cv-08292-SHS;  
Case No. 1:23-cv-10211-SHS

**DECLARATION OF SERVICE BY  
ROHIT D. NATH IN SUPPORT OF  
AUTHOR CLASS PLAINTIFFS'  
NOTICE OF ERRATA AND  
CORRECTION TO DKT. 81 IN THE  
AUTHORS ACTION**

I, Rohit D. Nath, declare:

1. I am over eighteen years of age, I am not a party to this action, and I am an employee with the law firm of Susman Godfrey L.L.P., in the Los Angeles, California office.
2. My business address is 1901 Avenue of the Stars, Suite 950, Los Angeles, California 90067.
3. On February 28, 2024, I served a copy of the Author Class Plaintiffs' Opposition to Motion to Intervene and Dismiss, Stay or Transfer via email upon the following persons:

*Attorneys for Defendant,  
OpenAI Inc.,*

*Attorneys for Defendant,  
Microsoft Corporation*

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 28, 2024, at Los Angeles, California.

*Rohit D. Nath*  
Rohit D. Nath